

PROPOSED VERDICT FORM

We, the jury, unanimously find with respect to the claims of Plaintiff as follows (place an “X” on the appropriate line for each claim):

1. CLAIM I – PROCEDURAL DUE PROCESS

1a. For Defendant Melissa Elliott

OR

_____ For Plaintiff
_____ For Defendant

1b. For Defendant Tricia Carlson

OR

_____ For Plaintiff
_____ For Defendant

2. CLAIM II – PROCEDURAL DUE PROCESS, INSTITUTIONAL CLAIMS

For Defendant Sheriff Earnell Lucas

OR

_____ For Plaintiff
_____ For Defendant

IF YOU FOUND FOR DEFENDANTS ON ALL CLAIMS ABOVE, DO NOT COMPLETE THE BELOW SECTION RELATED TO CAUSATION, AND PROCEED TO SIGN THE VERDICT FORM ON THE LAST PAGE.

IF, HOWEVER, YOU FOUND FOR PLAINTIFF ON ONE OR MORE OF THE CLAIMS ABOVE, CONTINUE BELOW TO THE NEXT SECTION ON CAUSATION BEFORE SIGNING THE VERDICT FORM ON THE LAST PAGE.

3. Damages – Causation

*For each defendant – answer **ONLY** if you found against that particular defendant on one or more Counts above. If you did not find against a defendant on any claim, skip this section for that particular defendant.*

3a. Defendant Melissa Elliott

Do you find that the procedural due process violation by Defendant Melissa Elliott was a factual cause in an injury to Robert Tatum?
(Answer **only** if you found that Defendant Elliott was deliberately indifferent in Claim I, above).

YES _____ NO _____

3b. Defendant Tricia Carlson

Do you find that the procedural due process violation by Defendant Tricia Carlson was a factual cause in an injury to Robert Tatum?
(Answer **only** if you found that Defendant Carlson was deliberately indifferent in Claim I, above).

YES _____ NO _____

3c. Defendant Sheriff Earnell Lucas

Do you find that the procedural due process violation by Defendant Earnell Lucas was a factual cause in an injury to Robert Tatum?
(Answer **only** if you found that Defendant Lucas was deliberately indifferent in Claim II, above).

YES _____ NO _____

Jury Signatures

SO SAY WE ALL:

Foreperson

Dated: _____